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15 Attorneys for Defendant,  
16 WESTCOR LAND TITLE INSURANCE COMPANY

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18 **UNITED STATES DISTRICT COURT**  
19  
20 **DISTRICT OF NEVADA**

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22 WELLS FARGO BANK, NATIONAL  
23 ASSOCIATION, AS TRUSTEE FOR  
24 MORGAN STANLEY CAPITAL I INC.  
25 TRUST 2006-HEI, MORTGAGE  
PASS-THROUGH CERTIFICATES, SERIES  
2006-HEI,

Plaintiff,

CASE NO.

**PETITION FOR REMOVAL**

26 vs.  
27  
28 WESTCOR LAND TITLE INSURANCE  
COMPANY; DOE INDIVIDUALS I through X;  
and ROE CORPORATIONS XI through XX,  
inclusive,

Defendants.

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30 PLEASE TAKE NOTICE that Defendant Westcor Land Title Insurance Company  
31 (“Defendant”), by and through its attorneys of record, the law firm of MAURICE WOOD, removes  
32 this action from the Eighth Judicial District Court, Clark County, Nevada to the United States  
33 District Court for the District of Nevada.

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35 Federal jurisdiction exists over this proceeding pursuant to 28 U.S.C. §§ 1332, 1441, and  
36 1446 because there is complete diversity among all of the properly named parties and because the  
37 amount in controversy exceeds \$75,000. In support of removal, Defendant states as follows:

1. The basis for removal is diversity of citizenship pursuant to 28 U.S.C. § 1332.
2. Complete diversity exists as follows:
  3. a. Defendant is a South Carolina corporation, with its principal place of business in the State of Florida. Accordingly, Defendant is considered a citizen of Florida and South Carolina pursuant to 28 U.S.C. §1332(c).
  4. b. Plaintiff is a national banking association with its principal place of business in California. See Compl. at ¶ 1. Accordingly, Plaintiff is considered a citizen of California pursuant to 28 U.S.C. §1332(c).
5. 3. The amount in controversy exceeds the jurisdictional requirement as follows:
  6. a. Plaintiff alleges compensatory damages up to the Amount of Insurance of the Title Policy, which totals \$199,750.00. See Compl. at 25, 29.
  7. b. Plaintiff also requests punitive damages, attorneys' fees and costs, and additional statutory damages under NRS 686A.310, NRS 41.600, and NRS 598.0915. See id. at 22–25.
8. 4. This removal is timely. On February 5, 2021, the Complaint and Summons were served via personal service on Defendant's resident agent.
9. 5. Accordingly, this Petition for Removal was filed within thirty days from the date of Defendant's receipt of the Complaint and Summons under 28 U.S.C. § 1446(b).
10. 6. Less than one year has elapsed from the date the action was commenced in state court.
11. 7. Removal from state court to this Court is proper in this case as this District embraces the place where the action is currently pending. See 28 U.S.C. § 1441(a).
12. 8. Pursuant to 28 U.S.C. § 1446(a), Westcor has annexed all process and pleadings served upon Westcor and the same are attached hereto as **Exhibit 1**.
13. 9. Pursuant to 28 U.S.C. § 1446(d), a true and correct copy of the original Petition for Removal has been filed concurrently herewith with the Eighth Judicial District Court, Clark County, Nevada and served upon the Plaintiff in this case.

MAURICE WOOD  
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I am an employee of Maurice Wood, and that on the 26<sup>th</sup> day of  
3 February, 2021, I caused to be served a true and correct copy of the foregoing **PETITION FOR**  
4 **REMOVAL** in the following manner:

5 (UNITED STATES MAIL): By depositing a copy of the above-referenced document for  
6 mailing in the United States Mail, first-class postage prepaid, at Las Vegas, Nevada, to the parties  
7 listed below at their last-known mailing addresses, on the date above written:

8 Darren T. Brenner, Esq.  
9 Lindsay D. Robbins, Esq.  
Wright, Finlay & Zak LLP  
10 7785 W. Sahara Ave., Suite 200  
11 Las Vegas, NV 89117  
12 *Attorneys for Plaintiff,*  
*Deutsche Bank National Trust Company as Trustee for New Century*  
*Home Equity Loan Trust, Series 2005-D, Asset Backed Pass-Through Certificates*

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16 */s/ Brittany Wood*  
17 An Employee of MAURICE WOOD  
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